

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GENE BROWN, KENNETH EDWARDS,
ALAN HANDELL, ROBERT HEISS,
CAROLINE JAISARIE, KRISTIN LEU,
KEVIN O'SULLIVAN, JUAN PAZMINO,
HARRY PRECOURT AND ROSALIND
WILSON,

Plaintiffs,

-against-

PHILIP J. CALDARELLA,

Defendant.

Case No. 08-CV-0857 (DLC)

AFFIDAVIT OF KENNETH EDWARDS

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Kenneth Edwards being duly sworn, deposes and says:

1. I am a former Board member of Binding Together Incorporated, and a plaintiff in this action. I make this affidavit based upon my personal knowledge.

2. I am a graduate of the BTI program. I served as a member of the Board of BTI from approximately 1996 through 2007. This was a non-paid position. I do not own, nor have I ever owned, any interest in BTI. I joined the Board of BTI in order to give something back to the organization that helped me get on my feet and learn important job skills. I am currently employed by the New York City Housing Authority, where I supervise two copy centers.

3. I never signed Philip Caldarella's employment agreement, and I never understood myself to be a party to it. I did not play any role in the negotiation or drafting of the agreement. I never personally agreed to be bound to Mr. Caldarella's employment agreement with BTI, nor did I ever express any intent to be bound to it, to Mr. Caldarella or anyone else.

4. In March 2004, I was working two jobs and my annual income was approximately \$60,000. Under no circumstances would I have agreed to personally guarantee Mr. Caldarella's salary payments, which were far greater than my own income, or accept any personal obligations under any contract for BTI.

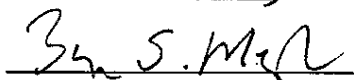
5. I have never agreed to be bound by any arbitration agreement with Mr. Caldarella, or agreed to submit to the jurisdiction of the American Arbitration Association. The AAA charges fees for its work, and I have never consented to paying any such fees.

6. In or about August, 2007, I, along with several other BTI Board members, voted to approve the termination of Mr. Caldarella's employment for "cause" based on evidence presented to the Board that Mr. Caldarella had mismanaged BTI's affairs, leaving it in a state of severe financial distress. My attorney has informed me that the facts surrounding Mr. Caldarella's termination have been submitted to this Court as Exhibit A to the Phillips Declaration.

7. Mr. Caldarella now seeks to sue me in my personal capacity for over a half a million dollars claiming that my vote to terminate his employment was made in bad faith and with the specific intent to harm him. These allegations are completely false, and I intend to vigorously defend against these allegations. It is absolutely critical that I have all of the procedural protections afforded by a court of law in defending against these claims. I have never relinquished my right to these protections.


Kenneth Edwards

Sworn to before me this
11th day of February 2008


Notary Public

BYRON S. MENEGAKIS
Notary Public, State of New York
No. 41-4941251
Qualified in West County
Commission Expires August 1, 2010